UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE: BAIR HUGGER FORCED AIR WARMING DEVICES PRODUCTS LIABILITY LITIGATION

MDL No. 15-2666 (JNE/DTS)

THIS DOCUMENT RELATES TO: 17-cv-05274 (Capone v. 3M Co., et al.)

L.R. 7.1(C) WORD COUNT COMPLIANCE CERTIFICATE REGARDING PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINTS

This response complies with the word limitation of L.R. 7.1(f) because this response contains 1,060 words, including all text, headings, footnotes, and quotations, other than the parts of the brief exempted by LR 7.1(c). This response was prepared using Microsoft Office Word 2010.

This response complies with the type size requirements of LR 7.1(h) because this brief has been prepared using at least font size 13, is double-spaced (except for headings, footnotes, and quotations that exceed two lines) and is submitted on $8^{1/2}$, by 11" paper with at least one inch of margins on all four sides.

DATED: Feburary 21, 2019 Respectfully submitted,

BERNSTEIN LIEBHARD LLP

By: /s/ Daniel C. Burke

Daniel C. Burke 10 E. 40th Street New York, NY 10016

Telephone: (212) 779-1414 Facsimile: (212) 779-3218 Email: dburke@bernlieb.com Email: dweck@bernlieb.com

Attorneys for Plaintiff